

EXHIBIT 2

1 Scott E. Radcliffe, (CA BAR NO. 278098)
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Plaintiff
Blaine Harrington III

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

MAUREEN HARRINGTON, as
personal representative for the estate of
BLAINE HARRINGTON III,

Plaintiff,

v.

DEEPAK DUGAR, M.D. a MEDICAL
CORPORATION,

Defendant.

Civil Action No. 2:22-cv-08230-PA-E

**PLAINTIFF'S RESPONSES TO
DEFENDANT'S FIRST REQUEST
FOR PRODUCTION**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure,
plaintiff/counter-defendant Maureen Harrington, as personal representative of the
estate of Blaine Harrington III ("Plaintiff"), submits these responses to

1 2. Documents evidencing all expenses you incurred in connection with
2 taking the Subject Photograph.

3 **RESPONSE:** Plaintiff is not in possession, custody, or control of any
4 documents responsive to this request.
5

6 3. All correspondence between you and the U.S. Copyright Office
7 concerning your application to register copyright in the Subject Photograph,
8 inclusive of the application and any photographs or other material submitted as
9 part of the application.
10

11 **REPOSENSE:** Plaintiff is not in possession, custody, or control of any
12 documents responsive to this request.

13 4. Documents supporting your allegation that Dugar Corp. acted
14 willfully in connection with its alleged infringement of your copyright in the
15 Subject Photograph.
16

17 **RESPONSE:** Documents responsive to this request are being produced
18 contemporaneously herewith.

19 5. Documents evidencing the terms of all licenses you or any person on
20 your behalf have granted to others for use of the Subject Photograph since you
21 created it.

22 **RESPONSE:** Plaintiff is not in possession, custody, or control of
23 documents responsive to this request.
24

1 22. Documents evidencing your approval of any complaints filed by any
2 attorney alleging copyright infringement of any photograph in which you claim to
3 own copyright since January 1, 2017.

4 **RESPONSE:** See response to Request No. 21.

5
6 23. Documents evidencing your approval of the terms of settlement with
7 any person of any claims you have asserted that such person infringed the copyright
8 in any photograph you claim to own, since January 1, 2017.

9 **RESPONSE:** See response to Request No. 21.

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13 Dated: May 31, 2023.

ALVES RADCLIFFE LLP

14 By: /s/ Scott E. Radcliffe

15 SCOTT E. RADCLIFFE
16 Attorney for Plaintiff
17 Blaine Harrington III

18 **CERTIFICATE OF SERVICE**

19 I hereby certify that on May 31, 2023, I served the foregoing document via
20 e-mail to: Vincent L. Ravine, Esq. (vince@vravinelaw.com) and Jeffrey L.
21 Squires, Esq. (jsquires@squireslegal.com).
22

23 /s/ Scott E. Radcliffe
24 Scott E. Radcliffe, Esq.